

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

STARK COUNTY, *et al.*,

Plaintiffs,

and

v.

JOHN L. RUTH, *et al.*,

Defendants.

Case No. 5:11-cv-1322-JRA

**DECLARATION OF REED N. COLFAX IN SUPPORT OF
PLAINTIFF MEGAN MAYLE'S OPPOSITION TO
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

I, Reed N. Colfax, declare as follows: I am an attorney for Plaintiff Megan Mayle in this matter, and I have knowledge of the facts contained herein. I offer this declaration to authenticate the documents submitted in support of Plaintiff Megan Mayle's Opposition to Defendants John L. Ruth, Wales Ridge, LLC, and Yorkshire Apartments, LLC's Motion for Summary Judgment.

1. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the transcript of the Deposition of Megan M. Mayle, taken on March 1, 2012.

2. Attached hereto as Exhibit 2 is a true and correct copy of M. Mayle Application for Rental, dated April 24, 2008.

3. Attached hereto as Exhibit 3 is a true and correct copy of M. Mayle Lease Agreement, dated April 26, 2008.

4. Attached hereto as Exhibit 4 is a true and correct copy of Penson Properties Documents re: M. Mayle, dated August 15, 2008.

5. Attached hereto as Exhibit 5 is a true and correct copy of Thackeray Ledges Roommate Application.

6. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the transcript of the Deposition of Norman L. Druckenbrod, taken on March 15, 2012.

7. Attached hereto as Exhibit 7 is a true and correct copy of Druckenbrod HUD Complaint, dated August 7, 2009.

8. Attached hereto as Exhibit 8 is a true and correct copy of Thackeray Ledges Letter to A. Ankrum, dated June 3, 2008.

9. Attached hereto as Exhibit 9 is a true and correct copy of M. Mayle HUD Complaint, dated June 10, 2009.

10. Attached hereto as Exhibit 10 is a true and correct copy of V. Watson Letter to HUD, dated August 25, 2009.

11. Attached hereto as Exhibit 11 is a true and correct copy of Stark County Time Records, dated October 1, 2009.

12. Attached hereto as Exhibit 12 is a true and correct copy of excerpts of the transcript of the Deposition of Tina Hoover, taken on February 6, 2012.

13. Attached hereto as Exhibit 13 is a true and correct copy of excerpts of the transcript of the Deposition of Kendra M. Druckenbrod, taken March 15, 2012.

14. Attached hereto as Exhibit 14 is a true and correct copy of excerpts of the transcript of the Deposition of Nancy L. Schneff, taken February 6, 2012.

15. Attached hereto as Exhibit 15 is a true and correct copy of excerpts of the transcript of the Deposition Gene Schneff, taken on December 8, 2011.

16. Attached hereto as Exhibit 16 is a true and correct copy of excerpts of the transcript of the Deposition of Christopher Hylton, taken November 16, 2011.

17. Attached hereto as Exhibit 17 is a true and correct copy of excerpts of the transcript of the Deposition of Gregory A. Mays, taken April 4, 2012.

18. Attached hereto as Exhibit 18 is a true and correct copy of excerpts of the transcript of the Deposition of Joniece A. George, taken April 4, 2012.

19. Attached hereto as Exhibit 19 is a true and correct copy of excerpts of the transcript of Volume I of the Deposition of John F. Morrison, taken September 6, 2012.

20. Attached hereto as Exhibit 20 is a true and correct copy of excerpts of the transcript of the Deposition of Dona S. Mitchell, taken April 3, 2012.

21. Attached hereto as Exhibit 21 is a true and correct copy of V. Watson Letter to HUD, dated October 27, 2009.

22. Attached hereto as Exhibit 22 is a true and correct copy of OCRC Ruling on Request for Reconsideration.

23. Attached hereto as Exhibit 23 is a true and correct copy of excerpts of the transcript of the Deposition of Mary Ruth, taken December 6, 2011.

24. Attached hereto as Exhibit 24 is a true and correct copy of excerpts of the transcript of the Deposition of John L. Ruth, taken on December 7, 2011.

25. Attached hereto as Exhibit 25 is a true and correct copy of excerpts of the transcript of the Deposition of David G. Robinson, taken February 7, 2012.

26. Attached hereto as Exhibit 26 is a true and correct copy of excerpts of the transcript of the Deposition of Amon N. Robinson, taken February 8, 2012.

27. Attached hereto as Exhibit 27 is a true and correct copy of excerpts of the transcript of the Deposition of Nicole M. Miller, taken on March 26, 2012.

28. Attached hereto as Exhibit 28 is a true and correct copy of excerpts of the transcript of the Deposition of January Fisher, taken on November 17, 2011.

29. Attached hereto as Exhibit 29 is a true and correct copy of excerpts of the transcript of the Deposition of Donald Fisher, taken on November 17, 2011.

30. Attached hereto as Exhibit 30 is a true and correct copy of excerpts of the transcript of the Deposition of Christine M. White, taken on August 30, 2012.

31. Attached hereto as Exhibit 31 is a true and correct copy of Defendant John Ruth's Response to Plaintiff United States' Second Set of Interrogatories, dated August 23, 2012.

32. Attached hereto as Exhibit 32 is a true and correct copy of Letter to S. Herzog, dated April 4, 2006.

33. Attached hereto as Exhibit 33 is a true and correct copy of Notes re: B. Sallie, dated August 2, 2010.

34. Attached hereto as Exhibit 34 is a true and correct copy of Letter to C. White, dated February 2005.

35. Attached hereto as Exhibit 35 is a true and correct copy of N. Prather Roommate Application, dated January 29, 2008.

36. Attached hereto as Exhibit 36 is a true and correct copy of excerpts of the transcript of the Deposition of Nat Prather, November 16, 2011.

37. Attached hereto as Exhibit 37 is a true and correct copy of Letter to S. Lucien & G. Sancic, dated May 29, 2002.

38. Attached hereto as Exhibit 38 is a true and correct copy of Letter to K. Hissong, dated June 16, 2003.

39. Attached hereto as Exhibit 39 is a true and correct copy of Letter to A. Erskine, dated September 10, 2007.

40. Attached hereto as Exhibit 40 is a true and correct copy of Notes re: M. McManus.

41. Attached hereto as Exhibit 41 is a true and correct copy of Letter to P. Fink, dated August 3, 2011.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

EXECUTED ON: December 21, 2012

BY: /s/ Reed N. Colfax
Reed N. Colfax

Dated: December 21, 2012

Respectfully submitted,

/s/ Reed N. Colfax
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CERTIFICATE OF SERVICE

I hereby certify that on December 21, 2012, a copy of the foregoing was electronically filed. Notice of this filing will be sent to counsel of record for all parties by operation of the Court's Electronic Filing System. Parties and their counsel may access this filing through the Court's Electronic Filing System.

/s/ Reed Colfax
*Attorney for Individual Plaintiffs and
Plaintiff Stark County*